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Fact Sheet

Material safety data sheets and medications

In workplaces where employees are required to handle and mix drugs in the powder or liquid form, the package insert normally included with the drug may be substituted for the material safety data sheet (MSDS) if it includes all the information needed for Employee Right-to-Know (ERTK) training. Specifics from the ERTK standard are provided below to help clarify the issue.

According to Minnesota Rules 5206.0700 subp. 2, Employee Training, the following information must be included in the training program for all employees routinely exposed to hazardous substances:

- a summary of the ERTK standard and the employer's written ERTK program;
- specific information from the MSDS of the hazardous substances employees may be exposed to (see MN Rules 5206.0700 subp. 2); and
- where a written copy of all of the above information (e.g., MSDS) is located in the work area or facility and how employees can access the information.

Most drugs come with a package insert that, in some instances, includes the same information as an MSDS. In addition, a publication known as the *Physicians Desk Reference* (PDR) contains information about drugs. Because ERTK requires employers to maintain a "written document" that contains the information required for training, but does not specify that it must be an MSDS, MNOSHA's policy concerning MSDSs for drugs is as follows.

- In those situations where employees are required to handle or mix drugs in powder or liquid form in the course of their assigned job responsibilities, a package insert is acceptable in lieu of the MSDS if it includes all required information needed for training as outlined in MN Rules 5206.0700, subp. 2.
- The PDR does not contain enough information about most drugs to meet the training requirements of the ERTK standard; therefore, the PDR is not an adequate replacement and cannot be used in lieu of an MSDS.
- Finally, MSDSs are required for drugs that are not in final form and do not have package inserts that provide the information needed for training.

This material can be provided in different formats (Braille, large print or audiotape) by calling the MNOSHA Training/Outreach Office at (651) 284-5050; toll-free at 1-877-470-OSHA (1-877-470-6742); or via TTY at (651) 297-4198.